

[SUBMITTING COUNSEL SHOWN ON  
SIGNATURE PAGES]

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA**

SAN FRANCISCO DIVISION

IN RE KOREAN RAMEN ANTITRUST  
LITIGATION

THIS DOCUMENT RELATES TO:

All Actions

Case No. 3:13-cv-04115-WHO

**STIPULATION AND [Proposed] ORDER  
REGARDING HEARING DATE,  
BRIEFING SCHEDULE, AND PAGE  
LIMITS ON MOTIONS TO DISMISS  
THE TWO AMENDED  
CONSOLIDATED COMPLAINTS**

1 All ten (10) Indirect Purchaser Plaintiffs in Consolidated Action Case No. 3:13-cv-04115-  
2 WHO and all nine (9) Direct Purchaser Plaintiffs in Consolidated Action Case No. 3:13-cv-04148-  
3 WHO by and through their respective counsel of record, and all seven (7) Defendants by and through  
4 their respective counsel of record, stipulate as follows:

5 WHEREAS, June 9, 2014 is the deadline for all Defendants to respond to the Indirect  
6 Purchaser Plaintiffs' Consolidated Amended Complaint and to the Direct Purchaser Plaintiffs'  
7 Consolidated Amended Complaint;

8 WHEREAS, all Defendants state that they will be moving to dismiss the Indirect Purchaser  
9 Plaintiffs' Consolidated Amended Complaint;

10 WHEREAS, all Defendants state that they will be moving to dismiss the Direct Purchaser  
11 Plaintiffs' Consolidated Amended Complaint;

12 WHEREAS, the respective counsel for all Defendants state that they have been working to  
13 prepare and submit to the extent possible combined briefing on the Defendants' motions to dismiss  
14 the two Consolidated Amended Complaints;

15 WHEREAS, the respective counsel for all Defendants state that they anticipate filing with the  
16 Court on June 9, 2014 an omnibus motion to dismiss both Consolidated Amended Complaints on  
17 grounds common to them both and common to all seven Defendants ("the Omnibus Dismissal  
18 Motion"), a motion to dismiss the Indirect Purchaser Plaintiffs' Consolidated Amended Complaint on  
19 grounds not common with the Direct Purchaser Plaintiffs' Consolidated Amended Complaint but  
20 common to all Defendants ("the Separate IPP Dismissal Motion"), and certain motions to dismiss the  
21 Consolidated Amended Complaints on grounds unique to each of two of the Defendants ("the  
22 Separate Motion of Samyang Foods Co. Ltd." and the "Separate Motion of Sam Yang (U.S.A.)  
23 Inc.");

24 WHEREAS, October 1, 2014 is the first of the Court's civil law and motion dates (taking into  
25 account the necessary 35 days' notice) upon which the Court's public calendar indicates the Court is  
26 not unavailable and upon which all parties' counsel are available (earlier dates being unavailable to  
27 various counsel due to previously set trials in other cases and previously set travel);  
28

WHEREAS, the respective undersigned counsel for the parties have discussed the matters set forth herein and believe them to contribute significantly to judicial economy and to efficiency for the Court and the parties and their respective counsel;

NOW, THEREFORE, THE PARTIES, BY AND THROUGH THEIR RESPECTIVE UNDERSIGNED COUNSEL, HEREBY STIPULATE TO AN ORDER OF THE COURT AS FOLLOWS:

1. The hearing on the Defendants' Motions to Dismiss the two Consolidated Amended Complaints ("the Motions to Dismiss") shall be held October 1, 2014 at 2:00 p.m.
2. Oppositions to the Motions to Dismiss shall be filed on or before August 13, 2014.
3. Replies in support of the Motions to Dismiss shall be filed on or before September 17, 2014.
4. On the Omnibus Dismissal Motion, as defined in one of the recitals above, there will be a single memorandum in support of that motion the text of which shall not exceed 40 pages in length, there will be a single memorandum in opposition to that motion the text of which shall not exceed 40 pages in length, and there will be a single memorandum in reply in support of that motion the text of which shall not exceed 24 pages in length.
5. On the Separate IPP Dismissal Motion, as defined in one of the recitals above, there will be a single memorandum in support of that motion the text of which shall not exceed 15 pages in length, there will be a single memorandum in opposition to that motion the text of which shall not exceed 15 pages in length, and there will be a single memorandum in reply in support of that motion the text of which shall not exceed 9 pages in length.
6. On the Separate Motion of Samyang Foods Co. Ltd, as defined in one of the recitals above, there will be a single memorandum in support of that motion the text of which shall not exceed 10 pages in length, there will be a single memorandum in opposition to that motion the text of which shall not exceed 10 pages in length, and there will be a

1 single memorandum in reply in support of that motion the text of which shall not  
2 exceed 6 pages in length.

- 3 7. On the Separate Motion of Sam Yang (U.S.A.) Inc., as defined in one of the recitals  
4 above, there will be a single memorandum in support of that motion the text of which  
5 shall not exceed 10 pages in length, there will be a single memorandum in opposition  
6 to that motion the text of which shall not exceed 10 pages in length, and there will be a  
7 single memorandum in reply in support of that motion the text of which shall not  
8 exceed 6 pages in length.

9  
10 Dated: June 2, 2014

11 HAUSFELD LLP

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26 Interim Lead Counsel for the Direct Purchaser Plaintiffs  
27  
28

1 Dated: June 2, 2014

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9 Interim Lead Counsel for the Indirect Purchaser  
10 Plaintiffs

11 Dated: June 2, 2014

12 SQUIRE PATTON BOGGS (US) LLP

13 By: /s/ Mark C. Dosker

14 Attorneys for Defendants  
15 Nongshim Co. Ltd. and Nongshim America, Inc.

16 Dated: June 2, 2014

17 GIBSON, DUNN & CRUTCHER LLP

18 By: /s/ Joel S. Sanders

19 Attorneys for Defendants  
20 Ottogi Co. Ltd. and Ottogi America, Inc.

21 Dated: June 2, 2014

22 STEPTOE & JOHNSON, LLP

23 By: /s/ Edward B. Schwartz

24 Attorneys for Defendants  
25 Korea Yakult Co. Ltd. and Paldo Co., Ltd.

1 Dated: June 2, 2014

MAYER BROWN LLP

2  
3 By: /s/ Elizabeth Mann

4 Attorneys for Defendant  
5 Samyang Foods Co. Ltd.

6  
7 Dated: June 2, 2014

LAW OFFICES OF MICHAEL K. SUH &  
8 ASSOCIATES

9  
10 By: /s/ Edward Suh

11 Attorneys for Defendant  
12 Sam Yang (U.S.A.), Inc.

13  
14 **ORDER**

15  
16 PURSUANT TO STIPULATION, IT IS SO ORDERED.

17  
18 Dated: June \_\_, 2014

19 \_\_\_\_\_  
20 United States District Judge

**ATTESTATION**

I hereby attest that I have on file written authorization for any signatures indicated by a  
“conformed” signature (/s/) within this e-filed document.

*/s/ Mark C. Dosker*

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Mark C. Dosker